

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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BRIAN JONES,

Plaintiff,

v.

THE URBAN LEAGUE OF  
SPRINGFIELD, INC. and  
CAMP ATWATER,

Defendants.

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DOCKET NO. 04-cv-30215-MAP

**MOTION TO CONTINUE DATE TO REOPEN THE ACTION**

The plaintiff respectfully submits this Motion to Continue Date to Reopen Action. The plaintiff hereby moves this Court to continue the date by which either party may move the Court to reopen the action. As grounds therefore, the plaintiff states:

1. The defendant opted to draft the settlement agreement in this matter and sent a draft to the plaintiff on October 6, 2006.
2. The plaintiff made no substantive changes and indicated through counsel that he approved the agreement on that same day.
3. A revised settlement agreement was sent to the plaintiff by defendant late in the day on October 17, 2006, with a substantive change which was approved by the plaintiff on that day and which approval was communicated through counsel to the defendant on that day.

4. The terms of the Agreement provide that the settlement will not be fully consummated until up to 30 days after the plaintiff signs the Agreement, which he did on October 18, 2006.

5. The Agreement may therefore not be fully consummated until the end of business on Friday November 17, 2006.

6. That the date upon which the Agreement will be fully consummated is more than 30 days after the date originally ordered by the Court is due to no undue delay by the parties and, in particular, as shown above, the plaintiff responded immediately to all terms proposed or revised by the defendant.

WHEREFORE, the plaintiff requests of the Court that it ALLOW and ORDER until sometime after the date of November 17, 2006, on a business day, any party to move the Court, upon good cause shown, to reopen the action if settlement is not then consummated.

THE PLAINTIFF  
By his Attorney,

Dated: October 26, 2006

/s/ Suzanne Garrow  
Suzanne Garrow BBO# 636548  
Heisler, Feldman, McCormick,  
& Garrow P.C.  
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#### CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF).

/s/ Suzanne Garrow  
Suzanne Garrow